

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ANNE GRAND'MAISON, M.D.,

Plaintiff,

v.

ROSWELL PARK COMPREHENSIVE CANCER
CENTER; CANDACE JOHNSON, Ph.D., in her
individual and professional capacities; RENIER
BRENTJENS, M.D., Ph.D., in his individual and
professional capacities; CARL MORRISON, M.D.,
DVM, in his individual and professional capacities;
JOHN KANE III, M.D., in his individual and
professional capacities; and ERROL DOUGLAS,
Ph.D., in his individual and professional capacities,

Defendants.

**NOTICE OF
MOTION TO SEAL**

Civil Action No.:
1:23-cv-00099

PLEASE TAKE NOTICE that, upon the accompanying declaration of
Amanda L. Lowe, dated June 14, 2024, with exhibits; and the supporting memorandum of
law dated June 14, 2024, Defendants Roswell Park Comprehensive Cancer Center, Candace
Johnson, Renier Brentjens, Carl Morrison, John Kane and Errol Douglas will move this
Court before the Hon. Michael J. Roemer, United States District Judge, at the Robert H.
Jackson Courthouse, 2 Niagara Square, Buffalo, New York 14202, on a date and time to be
set by the Court for an Order:

1. Pursuant to L. Civ. R. 5.3(c), to file under seal a Proposed ESI Order
and Protocol; and
2. Granting such other and further relief as the Court deems just and
proper.

Dated: Buffalo, New York
June 14, 2024

PHILLIPS LYTLE LLP

By: s/ Amanda L. Lowe

Amanda L. Lowe

Emma P. Murphy

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Roswell Park Comprehensive Cancer Center,

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TO: All Counsel of Record via CM/ECF

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